NSW GOVERNMENT | SafeWork NSW

ENFORCEABLE UNDERTAKING

Part 11

Work Health and Safety Act 2011

The commitments in this enforceable undertaking
are offered to SafeWork NSW

by

Wood Group PSN Australia Pty Ltd

ACN 118 514 444

Privacy statement

SafeWork NSW respects your privacy and is committed to protecting personal information. The information provided on this document is for the purpose of making an undertaking to SafeWork NSW given for the purposes of part 11 of the WHS Act. This information will be managed within the requirements of the current state government privacy regime.

SafeWork NSW may publish the undertaking and the information contained in it for purposes identified in the undertaking or for other appropriate legal purposes in various publications such as newspapers and on its website. SafeWork NSW may be required to disclose personal information to other regulatory agencies in accordance with other law enforcement activities which may be conducted as part of an investigation. Further information on our privacy policy is available at www.SafeWork.nsw.gov.au

Enforceable Undertaking

Purpose

The purpose of this enforceable undertaking is to document the undertakings offered to SafeWork NSW (**SafeWork**) pursuant to Part 11 of the Work Health and Safety Act 2011 (**WHS Act**) in connection with matters relating to alleged contraventions of the WHS Act or the Work Health and Safety Regulations 2011 (**the Regulations**).

Section 1 – General information

a. Details of the person proposing the undertaking

Street Address:		**Level 3** **171 Collins Street** Melbourne, VIC 3000
Postal address:		**Level 3, 171 Collins Street,** Melbourne, VIC 3000
Telephone contact:		[redacted]
Email address:		[redacted]
Legal structure:		Proprietary limited company
Type of business:		Engineering and consultancy services
Commencement date of the entity:		24 February 2006
Number of workers:	Full-time:	1258
	Casual:	43
Products and services:		Engineering and maintenance services

b. Details of the alleged contravention

It is alleged by SafeWork New South Wales (SafeWork) that on 12 July 2013, Wood Group PSN Australia Pty Ltd (WGPSN) failed to discharge its obligations as a person conducting a business or undertaking under section 19(1) of the WHS Act in that it did not ensure so far as reasonably practicable the health and safety of workers.

c. Details of the events surrounding the alleged contravention

On 12th July 2013 two fitters and a supervisor in a work group of three were performing a product transfer operation at the Caltex Banksmeadow Terminal from storage tank (TK901) which contained 2 million litres of unleaded petrol. During the activity, at around 1:30 am, a cam-lock hose coupling failed resulting in an uncontrolled release of 157,205 litres of unleaded petrol into the bunded area of tank TK901. Two workers were exposed to unleaded petrol and subsequently admitted to hospital for a precautionary check. Both workers were discharged on the same day as the incident without medical treatment.

d. An acknowledgement that SafeWork alleged a contravention has occurred

It is acknowledged that SafeWork has alleged that WGPSN has contravened section 19(1) of the WHS Act.

e. The details of any injury that arose from the alleged contravention

Two workers were admitted to hospital and were subsequently released without medical treatment after four hours of observation. [redacted]

f. The details of any enforcement notices issued that relate to the alleged contravention

Were notices received?

No ☒

g. A statement of assurance about future work health and safety behaviour

WGPSN is committed to complying with its obligations under the WHS Act and ensuring, so far as reasonably practicable the health and safety of all workers and those who may be affected by its business or undertakings.

When an alleged contravention is associated with an injury/illness

h. The details of the type of workers compensation provided (if the injured person(s) is a worker of the person)

A workers compensation claim was lodged for the worker [redacted]

i. The details of the support provided, and proposed to be provided, to the injured person(s) to overcome the injury/illness

Yes ☒

[redacted] In May 2014 the worker was deemed fit to return to work on restricted duties. He was then assessed and cleared fit to return to pre-injury duties on 13 October 2014. The return to work was planned and managed in a phased manner.

WGPSN's work at the work site came to an end and the team demobilised.

j. If the matter involves a fatality or very serious injury[1], a claim to demonstrate that exceptional circumstances exist that the enforceable undertaking is a more appropriate response than pursuing prosecution

Does the contravention involve a fatality or very serious injury[1]?

No ☒

k. The details of any existing work health and safety management system (WHSMS) at the workplace including the level of auditing currently undertaken

WGPSN has established an HSE management system in conformance with the Wood Group HSE Management System Standard (Blue Book). The current Blue Book standard is aligned with the international standards 14001 and 18001. The Blue Book is currently being revised to ensure alignment with the soon to be published 45001.

Safety and Assurance is one of Wood Group's core corporate values and this is reflected in this Health, Safety & Environmental Management System to manage the Health, Safety and Environmental (HSE) aspects associated with the execution of the services contract.

WGPSN adopt a risk-based audit program with in the region. This is a process whereby WGPSN verifies its compliance with WGPSN procedures, Client procedures and relevant local legislation against predetermined high risk areas. These audit programs are monitored and actions tracked.

l. The details of any consultation undertaken within the workplace regarding the proposal of an enforceable undertaking

As part of the corrective actions undertaken in the aftermath of this incident WGPSN have communicated the events and learnings to all levels of WGPSN. This started with WGPSNs workforce in NSW through to WGPSNs offices and sites Australia-wide. This communication also included consultation with each party with respect to shaping the enforceable undertaking. Specifically:

- The Eastern Australia Leadership team was briefed and consulted in its monthly HSEQ Forum
- The Australia and Asia Pacific HSEQ team (this comprises of the HSEQ regional director and the HSEQ leads from each project) was consulted as part of their regular team calls
- The HSE Committee (This comprises of HSE corporate management and the office based contract HSE representatives) was consulted as part of their monthly meeting and will participate in the development and roll out of the Wellbeing program, following approval.
- The WGPSN employees at Caltex Lytton were consulted through their local HSR meeting. The WGPSN site management team at Caltex Lytton also held a meeting specific to the

1. An injury that has caused nervous system damage liable to lead to mental incapacity or permanent restriction of mobility or involves a major amputation of a limb or parts of the body, for example, amputation above the knee or elbow. This term is not defined in the WHS Act; it is used within this document to identify certain circumstances which will trigger additional steps in the enforceable undertaking process.

findings of the incident to review them and discuss their focus areas going forward in response to those findings.

m. A statement of regret that the incident occurred (i.e. not an admission of guilt)

WGPSN deeply regrets that the incident on 12 July 2013 occurred and that it created a significant potential risk to the health and safety of the personnel at the Banksmeadow Terminal site. This is a matter WGPSN takes very seriously and is committed to putting actions in place to prevent a repeat of such an incident.

n. Any rectifications made as a result of the alleged contravention

Description
The following rectifications were implemented to avoid a reoccurrence of the incident : 1. On the day of the incident a pre-shift meeting was held to inform workers of the incident 2. A 'Hard won lessons' Safety alert was developed and communicated at all levels of the organisation 3. A good practice bulletin on the use of Camlock fittings was subsequently developed and distributed across the global WGPSN organisation 4. A blanket ban on all ongoing work at Banksmeadow Terminal was implemented further to outcomes of the investigation were completed 5. An external provider was engaged and delivered legal awareness training to WGPSN Superintendents, Supervisors, Planners and Leading Hands based at the Caltex site 6. A Skilled labour document was created in conjunction with Caltex to reflect controls and appropriate supervision provision for ad hoc labour supply requests 7. Regional Town hall addresses and alignment workshops were delivered by the MD and Regional Director across the region 8. A written project communication and site-wide town halls were dedicated to reiterate 'best practice' care for workers post-incident across the Caltex assignment and a second communication was dedicated to providing workforce guidance on their limit of capability when requested to perform operational activities 9. WGPSN shared their formal advice to Caltex regarding the following operation recommendations : a. Requirement for a Product Transfer procedure b. Permit to Work Review and Improvement plan c. Camlock best practice 10. A one hour Refresher safety training session on Camlock use was rolled out to the Caltex WGPSN workforce 11. Duty of Care Checklist was issued which documented a mandatory risk assessment check sheet for proposed new worksites (within the existing Contract) prior to undertaking any trade activities 12. The communication of learning insights to the wider WGPSN organisation was delivered by the Regional Director via town halls at all of the regional contracts 13. On WGPSNs global quick call (the Organisations monthly telephone conference call by

senior management), the learnings were communicated and distributed

14. Developed and delivered an updated national Alcohol, Drugs and Solvents policy across the region in conjunction with a 'Just and Fair Culture' model for management of breaches

15. Creation of a new Regional HSE Compliance and Assurance Manager role

16. A one day training session on WHS and Incident Response Duties was delivered to the Regional leadership team by an external provider

17. A 'Fit for Work' video was created and distributed across WGPSN's business

18. A one hour session on the legal responsibilities of Senior Managers with respect to incident investigations was delivered by an external provider

19. Development and rollout of 'Leading from the Front' Supervisor training program

TOTAL AMOUNT SPENT ON RECTIFICATIONS **$239,050**

o. An acknowledgement that the enforceable undertaking will be published and publicised

WGPSN acknowledges that the enforceable undertaking will be published on SafeWork's internet site and may be referenced in SafeWork's publications.

WGPSN will, within 30 days of the date of acceptance of this enforceable undertaking, cause a public notice to be published in the Sydney Morning Herald.

p. A statement of ability to comply with the terms of the enforceable undertaking

WGPSN acknowledges that it has the financial ability to comply with the terms of this enforceable undertaking and has provided evidence with this undertaking to support this declaration.

q. Statement regarding relationships with beneficiaries

WGPSN acknowledges there are no known current relationships with any of the beneficiaries outlined in the enforceable undertaking, other than the current employees of WGPSN and the injured worker.

r. Intellectual property licence

WGPSN grants SafeWork a permanent, irrevocable, royalty-free, worldwide, non-exclusive license to use, reproduce, distribute, electronically transmit, electronically distribute, adapt, and modify any materials developed as a result of this enforceable undertaking.

s. The person is required to provide information regarding any prior work health and safety convictions

SafeWork requests a list outlining details of any prior work health and safety convictions or findings of guilt under work health and safety legislation[2] or work health and safety related legislation.

No ☒ WGPSN has had no prior work health and safety convictions.

2. Subject to any local legal constraints such as spent conviction legislation.

t. Acknowledgement of enforceable undertakings overview and guidelines

WGPSN has read and understood Enforceable undertakings – an overview, and Enforceable undertakings – guidelines for proposing an enforceable undertaking.

Section 2 – Enforceable Terms

a. A commitment that the behaviour that led to the alleged contravention has ceased and will not reoccur

WGPSN confirms that the behaviour that lead to the contravention has been identified, addressed and action taken to stop such behaviour. WGPSN will take all reasonably practicable steps to prevent recurrence of this type of incident.

b. A commitment to the ongoing effective management of work health and safety risks

WGPSN confirms its commitment that it will exercise its best endeavours to the ongoing effective management of work health and safety risks.

c. A commitment to disseminate information about the undertaking to workers, and other relevant parties (which may include work health and safety representatives), and in the annual report (if applicable)

WGPSN agrees to disseminate information about the enforceable undertaking within the workplace, including to the members of any health and safety committee, health and safety representatives. This information will be disseminated through team meetings and will be completed within 3 months from the date of acceptance of the enforceable undertaking.

d. A commitment to participate constructively in all compliance monitoring activities of the undertaking

WGPSN acknowledges that the responsibility for demonstrating compliance with this undertaking rests with the person who has given this undertaking. Evidence to demonstrate compliance with the terms will be provided to SafeWork by the due date for the term.

WGPSN acknowledges that SafeWork may undertake other compliance monitoring activities to verify the evidence that is provided and compliance with the relevant term. The evidence provided to demonstrate compliance with the undertaking will be retained by the person who has given this undertaking until advised by SafeWork that the undertaking has been completely discharged.

WGPSN acknowledges that SafeWork may initiate additional compliance monitoring activities, such as inspections, as considered necessary at SafeWork's expense.

Strategies that will deliver benefits to the workplace, industry and the community

e. Strategies that will deliver workplace benefits

1. Supervision Upskilling Program

Scope:
Front line leaders (WGPSN's supervision and leading hands) have a critical role to play in hazard identification and risk management at the site level.

The Supervision Upskilling Program will compliment and follow on from Wood Group's existing 'Leading from the Front', frontline leadership development programme which sets the foundation for key leadership capabilities required to position leaders for success.

The proposed specialist program, which we will call '**Engaging from the front'**, will assist in upskilling WGPSN's existing supervisors with tools, behaviours and methodologies to best enable them to supervise their team safely. These supervisors will then become the role models and catalysts for continually improving the safety culture within their teams.

The supervisor manual 'Passport to Supervision Excellence' (PSE) will be produced to complement this course. It will be used during the course and each attendee will receive a copy to take away, providing them with a reference tool to help reinforce their roles and responsibilities particularly regarding safety.

Target issue:
Supervisors and Leading Hands are critical to the creation of a culture of safety and assurance for all workers, within and outside of WGPSN. This incident highlighted the need to further develop this audience. The Supervision Upskilling Program will be developed so that they clearly understand their accountabilities in this and are also capable of engaging others (within their team, and client environments) to *deliver everyone home, safe, every day.* Lessons learned from the Banksmeadow incident, specifically risk awareness, duty of care responsibilities, legal responsibilities, 'Stop the Job' re-enforcement, management of change and deployment of personnel into client sites where WGPSN do not have direct supervision will be the main content of the program.

Tangible outputs:
There are two main outputs to this strategy; one realised immediately the other is more long term. The immediate output is that we have key leadership who are better informed and equipped to manage their workforce in a manner that keeps them safe. We will verify that the program has been effective in achieving this goal by testing each participant before and after the workshop. The test will cover all of the key themes of the program.

The long term output is an improvement in the safety culture of our on-site teams. This improvement is verifiable by our 'Behavioural Safety Standard' surveys. This is an existing initiative which we use to identify both positive and negative behaviours and attitudes in our workforce so we can encourage the positive and eliminate the negative. The Behavioural Safety Standard is aimed at three levels of roles:

- Everyone
- Supervisors
- Managers

For verifying the tangible output of this strategy the relevant levels are 'everyone' and 'supervisors'. We are not just verifying the change in behaviours of our supervisors alone, we want to see how their changing behaviours are influencing the whole workforce.

The Safety Behavioural Standards are linked through four themes:

- Standards – For everyone this confirmed as following rule and for supervisors it also mean ensuring compliance
- Communication – This requires everyone to speak up if they see that safety is being compromised and supervisor are expected to encourage their teams to do so
- Risk Management – We expect everyone to be mindful of risk and for supervisors to promote risk awareness
- Involvement – Everyone needs to get involved in safety, it isn't the responsibility of 'someone else' and supervisors need to ensure that all of their team is actively involved.

The safety behavioural standard is assessed by using a gap analysis workbook of standard questions that individuals fill out regarding the behaviours and attitudes of their supervisors, managers and the company in general regarding safety. Honest feedback is encouraged and all assessments are made anonymously. Surveys will therefore be conducted before and after the 'Engaging from the front' program to assess the efficacy of the program and verify that it has a lasting effect.

Audience / beneficiaries:
The proposed beneficiaries / audience for **'Engaging from the front'** will be the Supervisors and Leading Hands working for WGPSN in Australia. Other beneficiaries will be the members of the workforce. The upskilling of the supervisors and leading hands will enable them to make informed decisions to keep their people safe. The overall benefit of this program will be a safer workforce and a continually improved regional safety performance.

Delivery method:
The **'Engaging from the Front'** program will be delivered in the following way:

- Pre and post-workshop activities
- One full day facilitated workshop – four workshops will be held during the course of the EU each taking 15 participants; 60 participants overall.
- Implementation of a Leadership Safety goal for each participant. The goal will be defined by the participant and endorsed by their manager.
- Line Manager support and coaching

Timeframe:
The program design and development will commence within three months of acceptance of the enforceable undertaking. Design and development is targeted to take three months, following which, Wood Group will run four **'Engaging from the Front'** programs of up to 15 participants during the course of the EU. The timeframe from invitation to completion of the program (including pre-work, workshops and post-work) will be two months. The 'Engaging from the Front' program will be an ongoing program and therefore will run for the duration of the enforceable undertaking with two sessions being run in 2017 and two in 2018.

Work health and safety outcome:
Safety performance is determined by how organisations actually 'live' or 'act out' their WHS systems. The behaviours of people, both staff and contract, turn systems and procedures into reality. The outcome of this initiative lies in skills enhancement of leaders and in the longer term

setting the benchmark for Supervisors across the industry. The ultimate WHS outcome is a tangible improvement in WGPSNs safety culture which then maintained. Our continual assessment of the safety culture using our safety behavioural standard will allow us to verify such an outcome empirically.

Total estimated cost: $95,970

2. **Implementation of a SmartCard Training and Competency management process**

Scope:
Monitoring and keeping track of training competencies of WGPSN workers at site will be improved with the regional implementation of a SmartCard training and competence management package which will consist of a Database and Smart Cards with an embedded microchip. SmartCard is an existing technology but WGPSN will invest time and resources to adapt it in a bespoke manner that provides a best-fit solution to our requirements.
The system allows anyone to quickly view the current list of competencies and the training record which a card holder processes. This is achieved via the use of a barcode scanner which can be used from any smartphone, tablet or computer. This empowers WGPSN and its clients to quickly verify the training and capability of an individual before assigning them with a task. This is particularly useful for the management of WGPSN who are seconded to our client's workforce.
The database also generates automatic emails to remind the individual and their supervisors that their training needs updating to ensure that it remains current.

Target issue:
WGPSN understands that the competency and training requirements of all worksite workers is a priority and a key improvement action arising out of the incident. Currently, all competency and training requirements are managed at a site level using isolated databases and the individual carrying a number of paper cards for providing evidence for each competence. Having a regional oversight of all workers will assist with tracking of workers when they move contracts and enable supervision and management to determine whether a worker has the current credentials to undertake a task. Most of all this will ensure that we have a more effective vehicle for preventing our workforce being put into situations they do not have the competency to deal with.

Tangible outputs:
A WGPSN database will be created for worksite workers and cards will be issued to personnel. Verified training qualifications will be uploaded to the database and cards issued to relevant personnel. Training of the system will be delivered to the relevant Human Resources personnel. It is estimated that by the end of the roll out around 320 site personnel around Australia will be cardholders. This figure is based on the current numbers of field services personnel we have in our three largest contracts with site-based scope. The number of personnel enrolled onto the system by the end of the enforceable undertaking will be verifiable from the online database.

We will verify the effectiveness of the SmartCard System by auditing a minimum of 10% of our site workforce over the course of year 1 via Safety Leadership Visits, spot-checks and team auditing. The audit will assess the workscope against the workforces understanding of what competency is required to carry out the task they are doing. We will then use the SmartCard system to verify that each individual does have the requisite training and qualifications to be competent for their role in completing the workscope. For the system to be proven as effective we would expect to find no cases of our workforce executing tasks outside of their competency level.

Audience / beneficiaries:
This will provide a number of benefits to both worker and WGPSN. The worker will have tangible evidence of their current training status which will allow them to make an informed decision about their own competency to do a task. It will allow WGPSN and their clients to track all competencies and allow in field supervision to verify competency of personnel quickly when workers are moving between different work sites and work scopes.

Delivery method:
The information will be communicated and rolled out to the business via the People and Organisation (Human Resources) function.

- Create internal communications plan
- Communication with relevant WGPSN staff on use of SmartCard
- Communication with relevant WGPSN key customers, partners and contractors on use of SmartCard

Timeframe:
This strategy will commence within three months after the acceptance of this enforceable undertaking and be completed by August 2018. It will be implemented on a contract by contract basis. WGPSN will complete this for three blue collar labour contracts.

Work health and safety outcome:
This will provide assurance of WGPSN's capability to manage and track training and competency in the field and keep it up to date. In particular this ensures efficient management and tracking of the competencies of personnel that move between different sites. Supervisors, Management Workers and our clients will have added confidence from using an easily accessible tool to verify and confirm relevant competencies and training of personnel conducting work.

Total estimated cost: $64,400

3. **Worker Wellbeing Program for WGPSN**

Scope:
This is an initiative that will provide education, support and guidance taking into account both the workplace environment impacts on worker wellbeing and health and the personal impacts that lifestyle choice will have on the worker wellbeing. The initiative will be aimed at WGPSNs workforce first and twelve topics will be launched over a year on a monthly roll out. Based on our experience and feedback on these topics WGPSN will then select four topics to be revisited, improved and shared with the wider petroleum industry. Hence, the second part of this initiative comes under the label of 'strategies that will deliver industry benefits' which can be found in section (f) 5 below. The subsections below detail the initial development of the worksheets for the twelve worker wellbeing subjects and how we will communicate them to the WGPSN workforce.

Target issue:
Fitness for work and worker wellbeing does not begin and finish at the work site. Factors external to the work-life can have significant impacts on a workers capabilities and performance. With the implementation of this program WGPSN believes that a more informed workforce will be able to make educated choices about their fitness and capability to do a task and more importantly highlight when they are not in fact fit or capable to do a task.

Tangible outputs:

1. At the start of the month a personal email from a senior WGPSN leader presenting the wellbeing topic of the month will be sent to all employees. This will include important facts about the topic and any personal anecdotes the leader has regarding the topic.
2. A short factsheet will be published for each topic as reference material. WGPSN will consult with the relevant professional bodies to ensure the information is current and correct.
3. The subjects will be cascaded down through team meetings; toolbox talks; townhalls and posters. Guidance will be provided on how the topics tie into employers and workers responsibilities in the workforce and suggestions for making positive lifestyle changes.
4. A small booklet will also be developed as a reference 'Go-to-tool'.
5. The effectiveness of this program will be demonstrated by comparison of the following data before and after the roll-out of the program:
   - Employee absenteeism
   - Employee turnover
   - Employee engagement survey
   - Reports of back injuries in our HSE reporting system.
   - Reports of health and stress issues reported in our confidential Employee Assistance Program (EAP)
6. Provide SafeWork with a copy of the evaluation report.

Audience / beneficiaries:
This strategy will benefit all WGPSN workers that take on the advice and encouragement provided to make lifestyle changes. The program will not only improve their performance and safety at work but will also provide benefits outside work producing an all-round better quality of life.

Delivery method:
The program is designed to be delivered as a series of monthly themes and will be rolled out as such within WGPSN. Previously we have utilised the same methodology for rolling out our nine 'life-saving rules'. This was proven to be a very successful approach that embedded the knowledge of the 'life-saving rules' throughout the workforce. We will utilise this experience to roll-out the worker wellbeing program in a manner that makes an impression on our workforce.

The twelve wellbeing topics that will be covered are:

- Manual Handling
- Fatigue and shift work
- Stress
- Alcohol and substance abuse
- Mental Health
- Illness
- Fasting
- Smoking
- Diabetes
- Men's health
- Women's health
- Food and exercise

Each subject will be presented and discussed using several formats, as detailed in the tangible outputs.

Timeframe:
The strategy will commence within six months of the Enforceable Undertaking being approved. The development of the packs will take a further six months. The pack will roll out internally during the following twelve months.

Work health and safety outcome:
The aim of this pack is to help workers understand the links between their personal lives and their working lives, to educate them to make better life choices and to provide the employer with the tools to assist.

By combining both personal and work based topics it is also the aim that personnel will recognise the importance of speaking up if they are not fit for work or having the right channels to seek assistance should they feel they need it.

An additional health and safety benefit will be that employers, supervisors of people and colleagues are able to recognise the signs and symptoms of personnel who are not fit for work and take the appropriate steps to assist.

Total estimated cost: $30,000

4. **Process Safety Initiative for WGPSN**

Scope:
WGPSN recognises the need to focus on Process Safety in parallel with Occupational Health and Safety. WGPSN will create and tailor training videos and classroom based materials to be deployed across the business to improve Process Safety awareness. This gives a clear line of sight to promoting a positive safety culture throughout the organisation along with effective workforce engagement.

Target issue:
In the majority of WGPSN contracts the control of works on industrial facilities is normally administered and controlled by the Operator. However, it is also recognised that a critical aspect to Process Safety awareness is WGPSN workers understanding the associated hazards and risk exposures. By educating the workforce on the role that they play and how they can contribute positively to ensuring operational integrity is fundamental to safe control of works.

Increased knowledge and understanding in this arena will also empower the workforce to assure themselves that the necessary controls are in place; are robust and that the task is being managed and executed safely.

Tangible outputs:
1. WGPSN will develop two specific training videos and supporting material designed to develop improved awareness of process safety and major accident hazards and associated controls. The videos will focus on:

   - **The role of Leadership** – Targeting senior management through to supervision
   - **Assuring Operational Integrity** – Targeting front line workforce

2. WGPSN will measure the effectiveness of this initiative in three ways:
   - The current Safety Leadership Visit form will be amended to include questions pertaining to Process Safety to measure the understanding of the workforce and the effectiveness of the roll-out.
   - Benchmark current Process Safety performance and measure the improvement as a result of the initiative. This will be done using our incident management system.

- A continual review of our Impact system (used by WGPSN to identify non-conformance and preventative actions in relation to our procedures and manage their improvement) to determine if the rate of process safety related non-conformances/preventative actions is falling as a result of this program.

3. Provide SafeWork with a copy of the evaluation report.

Audience / beneficiaries:
The proposed audience and beneficiaries will focus on WGPSN front line workforce and respective line management

Delivery Method:
Mixture of in-house WGPSN and External Consultants will be used to develop the videos and training material.

The training will be a mixture of video and written material which will be delivered by internal business line management resources. WGPSN will engage with SafeWork NSW for technical advice in relation to identification, communication and promotion of Process Safety controls.

Timeframe:
The development and testing of the material will commence within three months of acceptance of the enforceable undertaking and will be completed by the end of Q1 2017. Roll out and deployment of material to Wood Group employees will take place over 2017.

Work health and safety outcome:
The use of the program will enable WGPSN frontline workforce and leadership awareness and understanding of:

- Process safety fundamentals
- Hazards and how to identify them
- How to manage and control these hazards

Individuals will benefit from the following:

- Improved Process Safety Awareness
- Improved individual responsibility for safety
- Reduced likelihood of a process safety incident
- Improved personal safety
- Continuous improvement of management system controls

Total estimated cost: $52,200

f. Strategies that will deliver industry benefits

5. <u>Worker Well Being Program for the Wider Petroleum Industry</u>

Scope:
Leading on from the initiative in section (e) 3, WGPSN will analyse the success and feedback of each topic and its effectiveness on changing the lifestyle of the workforce. WGPSN will then select four of the twelve topics and develop them into communication packs that can be shared with the wider industry in order to spread the benefit of our program.

Target issue:
Fitness for work and worker wellbeing does not begin and finish at the work site. Factors external to the work life can have significant impacts on a workers work capabilities and performance. With the implementation of this program WGPSN believes that a more informed workforce will be able to make educated choices about their fitness and capability to do a task and more importantly highlight when they are not in fact fit or capable to do a task.

Tangible outputs:

1. WGPSN will select the four most successful topics from the WGPSN internal roll-out of the worker wellbeing program and develop each of them into hour long webinars.

2. Four webinars to be promoted and hosted by SIA.

3. WGPSN will make available templates for written materials and posters from their internal program if requested.

4. The success of this strategy for the wider industry will be evaluated through participant feedback from the four Webinars presented via the collaboration with SIA. In addition to the immediate quality and usefulness of the Webinars the SIA will also get feedback from its membership who utilise the information presented to find out further down the line if this has had a lasting wellbeing effect on their workforce.

Audience / beneficiaries:
This strategy will benefit the wider petroleum industry and other industries in Australia.

Delivery method:
The Webinars will be hosted live by WGPSN but recorded and saved in the webinar databank of the SIA to extend the longevity of the benefits of the strategy. WGPSN will also offer templates for written materials and posters from their internal program. The use of webinars, rather than workshops in capital cities, will maximise the accessibility to all interested Australian companies.

Timeframe:
The strategy will commence within three months following the successful completion of the internal WGPSN program which covers twelve topics. That time period will allow us to evaluate the successfulness of the program and which four are appropriate to develop further and share with the wider petroleum industry. Taking three months to complete this stage with the help of SIA, WGPSN will then present the material to the wider audience using SIA hosted webinars at rate of one every two to four weeks.

Work health and safety outcome:
The aim of webinars and supporting material is to help workers understand the links between their personal lives and their working lives, to educate them to make better life choices and to provide the employer with the tools to assist.

By combining both personal and work based topics it is also the aim that personnel will recognise the importance of speaking up if they are not fit for work or having the right channels to seek assistance should they feel they need it.

An additional health and safety benefit will be that employers, supervisors of people and colleagues are able to recognise the signs and symptoms of personnel who are not fit for work and take the appropriate steps to assist.

Total estimated cost: $38,000

6. Process Safety Initiative for Wider Industry

Scope:
WGPSN recognises the need to focus on Process Safety in parallel with Occupational Health and Safety. In strategy (e) 4 WGPSN presented their proposal to increase process safety awareness within their own frontline workforce and leadership using knowledge-sharing videos. This strategy involves sharing those videos, with the help of the SIA, with the wider oil & gas industry in Australia so that they too can reap the benefit.

Target issue:
It recognised that a critical aspect to Process Safety awareness is in frontline workers and leaders understanding the associated hazards and risk exposures of the areas they are working in. By educating the workforce on the role that they play and how they can contribute positively to ensuring operational integrity is fundamental to safe control of works.

Increased knowledge and understanding in this arena will also empower the workforce to assure themselves that the necessary controls are in place; are robust and that the task is being managed and executed safely.

WGPSN recognise that the initiative laid out in (e) 4 above would also be beneficial to the wider oil & gas industry. This strategy documents how we will accomplish that.

Tangible outputs:
1. The educational videos on process safety will be freely provided to the SIA to add to their existing bank of safety related videos. SIA will promote amongst their members the addition of these videos.

2. Access to the videos will be free to all interested companies on the provision that they will take part in a survey that evaluates their effectiveness, or otherwise, in improving process safety awareness and performance.

Audience / beneficiaries:
The proposed audience and beneficiaries will be the wider oil & gas Industry within Australia

Delivery method:
WGPSN will work with the Safety Institute of Australia (SIA) to promote the videos and make them freely available to the oil & gas industries (and any other interested companies) in Australia. With the help of the SIA we will, via the use of surveys, evaluate the benefit generated by the videos on the process safety performance of the companies involved.

Timeframe:
The development and testing of the videos will commence within three months of acceptance of the enforceable undertaking and will be completed by the end of Q1 2017. Roll out and deployment of material to Wood Group employees will take place over 2017. This will allow WGPSN to refine the package further before sharing it with the wider industry during 2018.

Work health and safety outcome:
The use of the program will enable businesses involved in the oil and gas industry to build awareness and understanding of:

- Process safety fundamentals
- Hazards and how to identify them
- How to manage and control these hazards

Individuals will benefit from the following:

- Improved Process Safety Awareness
- Improved individual responsibility for safety
- Reduced likelihood of a process safety incident
- Improved personal safety
- Continuous improvement of management system controls

Total estimated cost: $15,000

g. Strategies that will deliver community benefits

7. Educating the Next Generation

Scope:
WGPSN will use their existing subscription to GradConnection, an online company that advertises graduate placements, jobs and internships, to advertise for a HSE internship for graduates. Interns will be assigned appropriate roles within WGPSN's Australian operations for prescribed durations. The intent is to give industry experience to young people from the community. WGPSN sees this as an opportunity to educate the next generation in the importance of good safety management at the workplace.

Target issue:
The challenge is for the oil & gas industry to learn from the past to prevent the repetition of similar incidents. WGPSN sees the opportunity to educate a number of the next generation so that they will pass on their learnings to their peers, educational institutions and the wider industry following graduation.

Tangible outputs:
1. Identification and subsequent employment of a student on a relevant course from a NSW university. Three students will receive this internship during the period of the undertaking; one for each of the next three summer vacation periods. The students will:
   - Deliver an end-of-program presentation to relevant stakeholders
   - Maintain a diary of activities/tasks/projects undertaken and an overall report.
   - Complete an evaluation form by the intern's direct manager.
2. WGPSN will consult with SafeWork NSW prior to the start of each internship to select the theme which best fits the WGPSN and SafeWork projects and initiatives that are current at the time.

Audience / beneficiaries:
The main beneficiaries will be the selected university students from NSW who will gain practical industry experience and exposure to real project work in the oil & gas industry. The student will be presented with a real life project to undertake and deliver during their internship period.
The students will present their findings at an end-of-program presentation to relevant stakeholders.

Delivery method:
WGPSN will utilise GradConnection to advertise the HSE internship opportunity to NSW university students. The internship will be targeted students studying an OHS or Environmental Engineering qualification but students studying other engineering subject with an interest in HSE would also be considered. The universities covered are:

- University of New South Wales
- University of Sydney
- University of Technology, Sydney
- Macquarie University
- University of Wollongong
- Western Sydney University
- University of Newcastle
- Charles Sturt University
- University of New England

There will be a review of the applications and a shortlist of candidates drawn up. Interviews (via telephone or video conferencing) will be conducted to select the successful candidate.

The student will be located on a NSW based project if WGPSN have one at the time of the internship. If not, they will be based at one of WGPSN's offices in Melbourne, Brisbane or Perth. WGPSN will pay for flights and accommodation during the internship. The student will be given a WHS themed project.

The theme for the internship will be aligned with one of the priority areas from the Australian Work Health and Safety Strategy 2012-2022. The four themes identified as been best aligned with WGPSNs strengths and experience (and therefore WGPSN can give the best support and relevant expertise) are:

- Leadership and culture
- Supply chains and networks
- Health and safety capabilities
- Healthy and safe by design

WGPSN will consult with SafeWork NSW prior to the start of each internship to select the theme from the above list which best fits the WGPSN and SafeWork projects and initiatives that are current at the time. This approach is intended to ensure the work completed by the student is optimal in its relevance and usefulness to the needs of WGPSN, SafeWork NSW and to the student's education.

Timeframe:
The strategy will commence following approval of the Enforceable Undertaking, starting with the recruitment process. The Intern program runs for a period of 12 weeks in the summer university break and will be open to students in their penultimate year. The aim is to have one Intern per year for three years in succession.

Work health and safety outcome:
The internship assists in the development of future professionals in NSW. The interns will receive valuable real life HSE experience prior to starting their careers. This builds better WHS competence for the benefit of the NSW community and NSW industry in general.

Total estimated cost:	**$102,510**
TOTAL ESTIMATED VALUE OF THE UNDERTAKING	**$398,080**

h. A commitment regarding linking the strategy and promotion of benefits to the enforceable undertaking

WGPSN is committed to ensuring that any promotion of a benefit arising from this enforceable undertaking will clearly link the benefit to the undertaking and that the undertaking was entered into as a result of the alleged contravention.

Where appropriate (i-l)

i. A commitment to establish and maintain (or maintain if a system already exists) a WHSMS

WGPSN already has in place a WHSMS consistent with the principles of AS/NZS 4804: 2001 Occupational health and safety management systems.

WGPSN acknowledges that the WHSMS will be maintained in accordance with the standard.

j. A commitment to ensure the WHSMS is audited by third party auditors

WGPSN has an existing internal independent auditing process in place. The internal auditors who undertake the audits are our own Independent Group HSSE Assurance Team. Being employed at Groups level the auditors are considered independent of the WGPSN service stream.

WGPSN acknowledges that details of the auditors' qualifications against the stated requirements will be provided with audit reports submitted to SafeWork.

WGPSN acknowledges that an initial internal audit will be conducted within six months and two further internal audits will be conducted during the course of the enforceable undertaking, one in 2017 and one in 2018. Each internal audit will cover one Australia-based contract.

k. A commitment to provide a copy of each finalised WHSMS audit report to SafeWork

WGPSN acknowledges that audit reports received from the auditor will be sent to SafeWork, within one month of the finalised audit report being received by WGPSN along with a letter certifying that the report has not been altered from the copy provided to the person by the auditor.

WGPSN acknowledges that within two months of receipt of the auditor's written report, SafeWork will be advised of the intended action in addressing each of the report's recommendations.

l. A commitment to implement the recommendations from these audits (unless otherwise negotiated with SafeWork)

WGPSN commits to fully implementing the intended actions arising from the audit according to the timeframes allocated to each of the individual corrective actions unless otherwise agreed by SafeWork.

Section 3 – Offer of undertaking

As a duly authorised person of WGPSN, I offer this undertaking and commit to the terms herein.

Signed: .....
[Duly authorised person]

Name: David Shaw

Position: Director, Eastern Australia Operations

Dated at Melbourne this 21st day of October, 2016

Section 4 – SafeWork's acceptance of undertaking

The duration of an enforceable undertaking is determined by the content of the agreed terms. An enforceable undertaking commences and is enforceable once accepted by SafeWork. The enforceable undertaking will be concluded on written advice from SafeWork when all requirements of the undertaking have been satisfactorily executed.

I accept this undertaking as an enforceable undertaking under section 216 of the WHS Act.

Signed: .....

Name: Peter Dunphy

Position: Executive Director SafeWork NSW

Dated at Gosford ..... this 9th day of November 2016
[suburb] [month] [year]